

<p>SHEILA NKEM,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>KILOLO KIJAKAZI, Acting Commissioner of Social Security,</p> <p style="text-align: center;">Defendant.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Case No. 1:20-cv-00416-EPG</p> <p><b>STIPULATION AND ORDER FOR EXTENSION OF TIME</b></p> <p>(ECF No. 19)</p>
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IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 49-day extension of time, from October 18, 2021 to December 6, 2021, for Plaintiff to serve on defendant with Plaintiff's Opening Brief. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Good cause exists. Counsel for the Plaintiff has four merit briefs due by October 18, 2021; counsel also has several letter briefs and two reply briefs. For the remainder of the week, Counsel for the Plaintiff has four briefs including a joint submission and reply briefs.

1 Counsel has recently received a greater number of Answers and Certified Administrative  
2 Records from defendant in cases in this district, and the three other California Districts, each of  
3 which require settlement negotiations or merit briefing. Counsel has a greater than usual number  
4 of merit briefs due in October and November 2021. Thus, Counsel is requesting an extension  
5 into December 2021 to accommodate the number of cases due in October and November 2021.  
6 Also, Counsel is in the process of increasing support staff to accommodate the increase in the  
7 number of cases at the briefing stage.

8 Defendant does not oppose the requested extension. Counsel apologizes to the Defendant  
9 and Court for any inconvenience this may cause.

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11 Respectfully submitted,

12 Dated: October 13, 2021

PENA & BROMBERG, ATTORNEYS AT LAW

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14 By: /s/ Jonathan Omar Pena  
15 JONATHAN OMAR PENA  
16 Attorneys for Plaintiff

17 Dated: October 13, 2021

PHILLIP A. TALBERT  
Acting United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

21  
22 By: \*/s/ Daniel P. Talbert  
23 Daniel P. Talbert  
24 Special Assistant United States Attorney  
25 Attorneys for Defendant  
26 (\*As authorized by email on October 13, 2021)  
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**ORDER**

Based on the above stipulation (ECF No. 19), IT IS ORDERED that Plaintiff shall file Plaintiff's opening brief no later than December 6, 2021. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: **October 14, 2021**

/s/ Eric P. Grogan  
UNITED STATES MAGISTRATE JUDGE